

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

DAVID REPYNECK, : CASE NO. 2017-15975  
Debtor : Date: March 10,2022  
: Time: 10:00 a.m.  
: Place: Courtroom 1  
: 201 Penn Street, 4<sup>th</sup> Floor  
Reading, PA 19601

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

David Repyneck has filed a Motion to Modify Confirmed Planwith the Court to reflect the payment of the mortgage arrears pursuant to a loan modification.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant relief sought in the motion or if you want the Court to consider your views on the motion, then on or before March 6, 2022 you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Clerk's Office, U. S. Bankruptcy Court  
400 Washington Street  
Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

David L. Marshall, Esquire  
60 East Court Street  
P. O. Box 1389  
Doylestown, PA 18901-0137

2. If you or your attorney do not take the steps described in Paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia Mayer on March 10, 2022 at 10:00 a. m. in Court Room No 1, United States Bankruptcy Court, The Gateway Building, 201 Penn Street, 4<sup>th</sup> Floor, Reading, PA 19601. Unless the Court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorneys named in Paragraph 1(b).

5. You may contact the Bankruptcy Clerk's Office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

EASTBURN & GRAY, P.C.

*By:* /s/ David L. Marshall

David L. Marshall, Esquire  
Attorney for David Repyneck  
Attorney I. D. No. 19356  
Eastburn and Gray, P.C.  
60 East Court Street  
Doylestown, Pa. 18901  
(215)345-7000  
Fax No. 215-542-9421

Dated: February 9, 2022

**CERTIFICATE OF SERVICE**

AND NOW this 9<sup>h</sup> day of March, 2022, DAVID L. MARSHALL hereby certifies that he served the Notice of Debtor's Motion to Modify Plan upon the following parties indicated below:

**By electronic notice only:**

Scott Waterman, Esquire  
Standing Chapter 13 Trustee  
2901 St. Lawrence Ave, Suite 100  
Reading, PA 19606

Office of the U. S. Trustee  
833 Chestnut Street, Suite 501  
Philadelphia, PA 19107

Rebecca Solarz, Esq.  
KM Al Law group, PC  
Suite 5000, BNY Mellon Independence Center  
701 Market St.,  
Philadelphia PA 19106 – 1532

**By United States Mail Postage Prepaid**

George Morrison, Esquire  
Weinstein & Riley P.S.  
2001 Western Avenue - Suite 400  
Seattle, Washington 98121

Cynthia A. Sallustio  
Court Operations Officer  
LEHIGH COUNTY DOMESTIC RELATIONS  
14 North 6<sup>th</sup> Street  
Allentown, PA 18101

Courtney Rediger  
PO Box 82609  
Lincoln, NE 68501-2609

EASTBURN & GRAY, P.C.  
By: /s/David L. Marshall  
David L. Marshall, Esquire  
Attorney I. D. No. 19356  
Eastburn and Gray, P.C.

60 East Court Street  
Doylestown, Pa. 18901  
(215)345-7000 - Telephone  
(215)345-9142 – Facsimile  
[dmarshall@eastburngray.com](mailto:dmarshall@eastburngray.com)  
Attorneys for Debtors

Date: February 9, 2022